

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re: Brian Watson Debtor)))))	Case No: 17-32953 Chapter: Chapter 13 Judge: A. Benjamin Goldgar
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NOTICE OF MOTION

To: Brian Watson, 4800 S Lake Park Ave. #1906, Chicago, IL, 60615

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

Illinois Student Assistance Commission, 1755 Lake Cook Rd., Deerfield, IL 60015

Attorney General of Illinois, 100 W. Randolph St., Chicago, IL 60601

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **April 28, 2020 at 1:30 p.m.** I shall appear before the Honorable Judge **A. Benjamin Goldgar** at 219 S. Dearborn St., Courtroom 642, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto. A party who objects to this motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

By: /s/ David Kosk
David Kosk

CERTIFICATE OF SERVICE

I, David Kosk, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 4/7/2020.

By: /s/David Kosk
David Kosk

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

ACS/Xenith
Attn: Bankruptcy Dept.
501 Bleecker St
Utica NY 13501

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

ALLY Financial
Attn: Bankruptcy Dept.
200 Renaissance Ctr
Detroit MI 48243

MiraMed Revenue Group
Bankruptcy Department
360 E 22nd St
Lombard IL 60148

Brightstar Financial

9725 NW 117th Ave
#300
Miami FL 33178

Northwestern Mem. Phys. Group
Bankruptcy Department
75 Remittance Dr., #1293
Chicago IL 60675

Capital One
Bankruptcy Department
PO Box 30285
Salt Lake City UT 84130

Northwestern Memorial Hospital
Attn: Bankruptcy Dept.
251 E. Huron St.
Chicago IL 60611

Blatt, Hasenmiller, Leibsker &
Moore LLC
Bankruptcy Dept.
10 S. LaSalle St. Ste 2200
Chicago IL 60603

Progressive
Bankruptcy Dept.
Dept 0561
Carol Stream IL 60132

Clerk, First Mun Div
Bankruptcy Dept.
50 W. Washington St., Rm. 1001
Chicago IL 60602

Sprint
Bankruptcy Dept.
PO Box 7949
Overland Park KS 66207

Capitalone
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond VA 23238

Capitalone
Attn: Bankruptcy Dept.
Po Box 30253
Salt Lake City UT 84130

Ccs
Bankruptcy Dept.
PO Box 55126
Boston MA 02205

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

First Premier BANK
Attn: Bankruptcy Dept.
601 S Minnesota Ave
Sioux Falls SD 57104

Illinois Department of Revenue
Bankruptcy Department
PO Box 64338
Chicago IL 60664-0338

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MOTION TO MODIFY CONFIRMED PLAN

NOW COMES the Debtor, Brian Watson (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 11/02/2017.
3. The Debtor’s plan was confirmed by the Court on 03/13/2018.
4. On 12/15/2017, the Illinois Student Assistance Commission filed proof of claim 3-1 for \$59,158.38.
5. The debt owed to the Illinois Student Assistance Commission is a student loan that is currently in deferment. The Debtor prefers to deal with this debt directly outside of his Chapter 13 plan as a long term debt.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to modify Section G to stop payments to student loans.

order:

1. Modifying Section G to state, “No claims shall be paid to the Illinois Student Assistance Commission their successors or assignees, or for any other student loans as such student loans are currently in deferment and shall be handled directly as long-term debt.”
2. Any other relief the court deems proper.

By: /s/ David Kosk
David Kosk

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960